

I urge the Commission to approve and adopt this petition RM-11305 in the spirit of deregulation of the Amateur Service, a policy that was begun over two decades ago through several previous rulemakings. This proposed rulemaking substitutes a voluntary system of mode co-ordination, by band, for a statutorily enforced band plan, yet it retains some incentive for amateur radio operators to upgrade their licenses in order to gain expanded operating privileges. This is a win-win situation for the Amateur Radio Service that will benefit everyone.

The current system governing amateur operations that has existed for many decades is a mixture of mandatory sub-bands based upon operating mode and license class, as well as several generally accepted "gentlemen's agreements" amongst radio amateurs. Examples of such voluntary agreements abound and have proven to be quite workable. Most importantly, though, the voluntary agreements have a greater ability to change in response to changes in the amateur community. The voluntary segregation of CW, and Phone in the 160-meter band, Data traffic occurring toward the middle of several HF bands, AM phone congregated around several accepted calling frequencies, and parts of several VHF bands being reserved for weak signal work show that voluntary compliance with such agreements is a fact of life driven by necessity. The ultimate example of a voluntary band plan is the fact that almost all CW traffic occurs within the designated CW sub-bands although CW as a mode is allowed anywhere within the amateur allocations, including HF phone sub-bands.

A similar system of voluntary frequency and mode coordination presently exists in other radio services governed by the Commission. This has prevented a regulatory system from developing that quickly becomes obsolete and "ossified" thereby stifling future growth through the inflexibility of regulations, exactly the problem radio amateurs now face.

As an amateur licensee I operate mainly in CW mode on the lower HF bands, I recognize that it is time to explore solutions for alleviating the crowded conditions that exist in the phone segments of the bands. Although any changes in the current sub-band structure may adversely impact my preferred mode of CW, I recognize the need to quickly adopt a fix for the current problems and to foster the growth of digital and other advanced modes.

Rather than adopt yet another set of mandatory sub-bands, I feel it is best to leave matters in the hands of the amateur community which will in time work out a viable set of operating practices and voluntary band plans similar to what is in place now, but with the flexibility to change as operating modes, technology, and interests grow, shrink, and change with the times.

Respectfully submitted,

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